

***United States Court of Appeals  
for the Second Circuit***



**APPELLEE'S BRIEF**





# 76-1583

IN THE UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT

UNITED STATES OF AMERICA,  
Appellee

v.

SALVATORE RINIOLO,  
Appellant

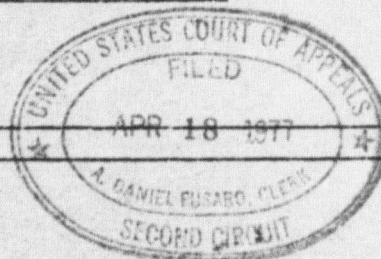
ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
FROM THE WESTERN DISTRICT OF NEW YORK

BRIEF FOR THE UNITED STATES

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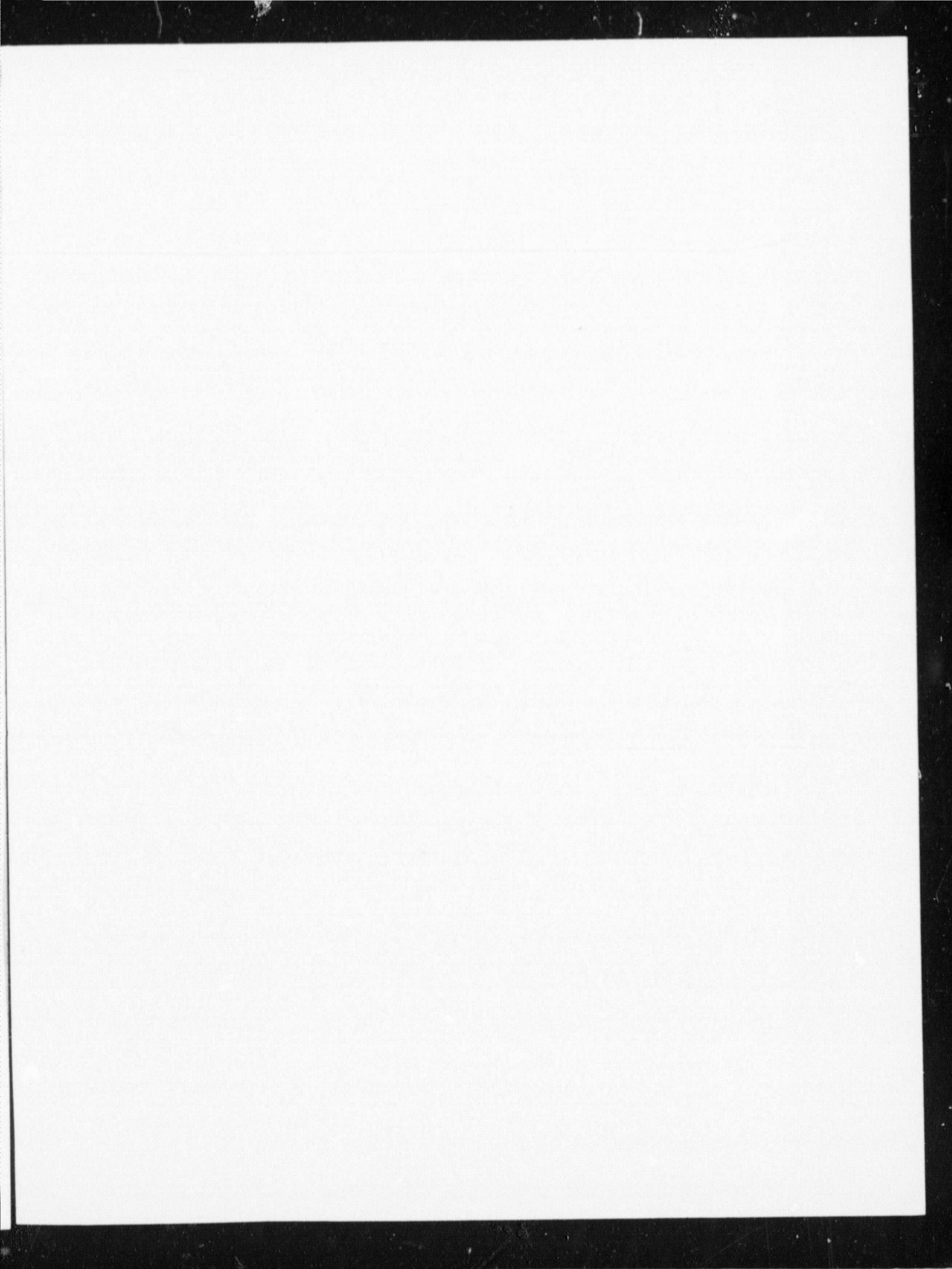
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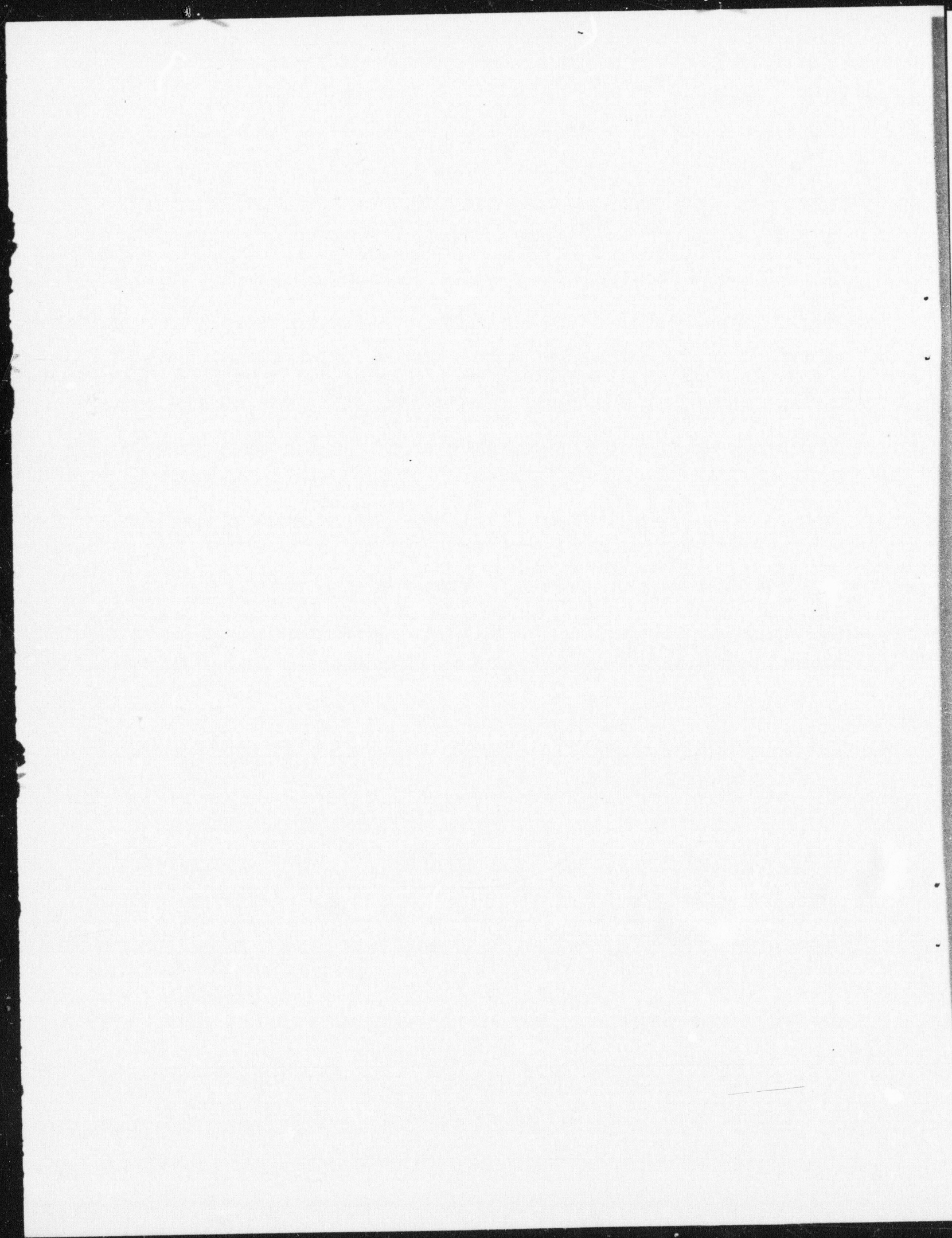
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FOR THE SECOND CIRCUIT

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No. 76-1583

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SALVATORE RINILOLO,  
Appellant

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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BRIEF FOR THE UNITED STATES

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QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support the conviction.
2. Whether affidavits executed in support of two search warrants established probable cause to believe a federal crime was being committed.
3. Whether the sentence was excessive.



## STATEMENT

Following a jury trial in the United States District Court for the Western District of New York, appellant was convicted of one count of conspiring to violate federal prostitution laws, in violation of 18 U.S.C. 371, 2421, 2422, 2423, and 1952.<sup>1/</sup> He was sentenced to two and one-half years' imprisonment.

In sum, the evidence at trial showed that appellant and codefendant Linda Ferguson<sup>2/</sup> operated a prostitution business in Buffalo, New York, between April 1972 and January 1974. Ferguson was the madame; appellant her pimp. The prostitutes lived either at Ferguson's apartment or in another apartment Ferguson maintained. Each girl usually stayed one week and then traveled to another location.

Our detailed review of the evidence, with record references, is set forth below under part I of our argument.

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1/ Appellant was originally indicted on five counts -- four substantive offenses (Counts 2 through 5) and the conspiracy charge (Count 1). The district court dismissed Count 5 at the conclusion of the government's case (Tr. 210) and the jury acquitted appellant of the other substantive counts.

2/ Ferguson pleaded guilty to the conspiracy count and to three counts of a related Boston indictment charging conspiracy and substantive violations of the anti-prostitution statutes.



## ARGUMENT

### I.

#### THE EVIDENCE WAS SUFFICIENT TO SUPPORT THE CONVICTION.

Appellant concedes that the evidence established the existence of a conspiracy to operate an interstate prostitution ring; that Linda Ferguson was the madame of the bordello in Buffalo, New York; that he was aware of the character of Ferguson's business; and that he had with Ferguson "a relationship of some years standing" (Br. 12, 14-15). He contends, however, that the proof was insufficient to demonstrate his participation in the conspiracy or knowledge of its interstate connections. As we now demonstrate, these claims are wholly without substance.

1. (a) Three former prostitutes who had worked in the Buffalo operation gave direct testimony that appellant was Ferguson's pimp and was actively involved in running the prostitution enterprise.

Darlene Baggetta testified (Tr. 140-153) that appellant on occasion played a personal role in the management of the business. In January 1974 -- when Baggetta was 17 years old -- Ferguson told her to live in apartment 401, 200 Niagara Street, Buffalo, which was connected to Ferguson's by a telephone extension line. When the customers called Ferguson they were directed to apartment 401 where the prostitution took place (Tr. 135-136, 151). Twice appellant visited Baggetta there, once to bring her a key (Tr. 152) and later to pick up the money that she had earned (Tr. 152). Appellant also instructed her to give



police a false name if arrested (Tr. 142).

On January 18, 1974, the Buffalo police did arrest Baggetta at apartment 401; she told them her name was "Joyce Williams." When Ferguson later appeared at the police station to take the girl home, she told Baggetta that the police "didn't want her [Ferguson] they wanted Sal," and "[a]ll she was concerned about was with Sal" (Tr. 149). Appellant then drove Baggetta from the station back to Ferguson's apartment where he and Ferguson questioned her about the arrest. Appellant told her that he and Ferguson had been "going for a good six years and that they expected a bust and that everything would be okay" (Tr. 149).

Rita Marie Burchill testified (Tr. 106-119, 127-129) that in December 1972 -- when she was 16 years old -- she was sent from a prostitute training farm in Ohio to work for Ferguson in Buffalo for one week (Tr. 107-110). Burchill's pimp, Raymond Pandelli, drove her to Buffalo at Ferguson's request (Tr. 108-109).

Burchill testified that she described the Pandelli operation to appellant and Ferguson and that both knew that she and Pandelli had driven to Buffalo from Ohio (Tr. 115-117). The witness also related two incidents illustrating the relationship between appellant and Ferguson. On one occasion, Ferguson wanted money to buy a surprise Christmas present for "Sam" (appellant's nickname). As Burchill explained (Tr. 117, 123):

During the week I had worked there, she [Ferguson] asked me if it was all right if she turned a few tricks because she wanted some



money so she could hold out on Sam, to get a Christmas present, something that he did not know about.

Q: That she was holding out some money on Sam?

A: Yes.

\* \* \*

I remember that she said she wanted to hold some money back. She asked me if it was all right, because all the customers were mine, because, you know, it was up to me to work there that week. She wanted to know if she could have a few tricks, customers, so that she could make some money that he [appellant] didn't know about for a Christmas present to surprise him.

Bruchill also described how appellant and Ferguson reviewed together the account books of the prostitution business (Tr. 117):

That night before I left, Linda and Sam were sitting on the couch going over the books, where they keep track of everything, and when she divided it all up and took out room and board, and she told me what I had coming, and she told me that wasn't bad, and Sam said, "That is not bad for a slow week."<sup>3/</sup>

A third former "employee," Flora Burkhart Majusic, testified (Tr. 72-82) that she had four week-long "bookings" as a prostitute with the Buffalo operation between April and July, 1972. Majusic said that Ferguson arranged the bookings by interstate telephone calls; that she (Majusic) traveled from

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<sup>3/</sup> At the end of Burchill's week, Mamie Harris, another madame who was working with Ferguson during this time (Tr. 129), arranged for Burchill to return to Pandelli who continued to use her as his prostitute (Tr. 118-119, 128). Pandelli was later convicted in connection with his prostitution operation, and his conviction was affirmed on appeal. United States v. Prince, 529 F.2d 1108 (6th Cir. 1976).



Ohio to Buffalo to work for Ferguson; and that Ferguson introduced appellant as her "old man", which Majusic understood to mean Ferguson's pimp (Tr. 79).<sup>4/</sup> The witness said that appellant stayed "practically all the time" (Tr. 78) at Ferguson's apartment, which was then being used as a bordello, and that he was well aware of the financial details of the business (Tr. 78, 79; see Tr. 75).

The witness further testified that, although she had to split all her earnings -- as much as \$600 per week -- with Ferguson, the madame had no presentable clothes and, on one occasion, had to borrow money from Majusic simply to buy groceries (Tr. 80, 81). (This took place the morning after Majusic had given Ferguson \$50 in profits from one night's work, Tr. 81). Appellant, she said, drove a "big Cadillac" (Tr. 81).

(b) The evidence recounted above refutes appellant's claim that he was not shown to have been a knowing associate in the prostitution conspiracy. His own words and actions show that he was not just an associate, but the managing partner. He reviewed the books, personally collected money, instructed at least one girl on dealing with the police, and retrieved her from the police station when she was arrested. There was additional evidence that Ferguson, who managed many details of

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4/ Betty Grand, a Pittsburg madame, described several interstate telephone calls she received from Ferguson concerning the prostitution business. Grand testified that Ferguson "definitely" had an "old man" or pimp whom she frequently mentioned, and that once Ferguson referred to her pimp as "Sal" (Tr. 70, 93).



the business, returned its proceeds to appellant; she was apparently completely dependent on him for money, and twice referred him as her pimp (Tr. 70, 79). Having conceded that the existence of the conspiracy was proved, only slight evidence was needed to show appellant's participation in it. United States v. Marrapese, 486 F.2d 918, 921 (2nd Cir. 1973), cert. den. 415 U.S. 994; see United States v. Head, 546 F.2d 6, 10 (2nd Cir. 1977). Taken as a whole and viewed in the light most favorable to the government, Glasser v. United States, 315 U.S. 60, 80 (1942); United States v. Cirillo, 468 F.2d 1233, 1238 (2nd Cir. 1972), the evidence here was more than slight; it was overwhelming.

2. Much the same evidence belies appellant's claim that he was unaware of the interstate connections of the business in which he played so prominent a part for so long. Indeed, appellant has conceded that he was at least familiar with the nature of Ferguson's business, and the evidence showed that the business involved calling similar operations in Pennsylvania (Tr. 58-61) and Ohio (Tr. 222) to bring in additional girls. One such girl, Rita Burchill, testified that she told appellant and Ferguson that she had come from Pandelli's operation in Ohio (Tr. 115-116).<sup>5/</sup>

<sup>5/</sup> The government's evidence also included telephone bills, tapes of interstate conversations, and two notebooks found in Ferguson's apartment (government's exhibits 3 and 5). One, exhibit 3, contains the names and telephone numbers of several prostitutes and Ferguson's notes concerning their skill and reliability; most of the telephone listings are out-of-state. Exhibit 5 is a record of daily receipts which mentions a prostitute from Pittsburg and indicates that on one occasion \$508 was given to "Sam R.". Appendix.



Beyond this direct evidence, however, it is simply inconceivable that appellant could have been Ferguson's pimp and the general manager of the business for six years and have been unaware of its interstate connections.<sup>6/</sup> Accordingly, the jury was warranted

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6/ See United States v. Marquez, 424 F.2d 236 (2nd Cir. 1970) which also involved a conspiracy to violate the Travel Act (18 U.S.C. 1952). This court held that knowledge of the interstate element of the crime may be proven by purely circumstantial evidence and that "[i]n the case of leaders of a conspiracy, an inference may be drawn in a proper case that the leader is aware of his underling's out-of-state residence (citations omitted)." Id. at 239. See also United States v. Corallo, 413 F.2d 1306 (2nd Cir. 1969) holding that where "the totality of the proofs" show the defendant to be "right in the thick of things" and a "central member" of the conspiracy, his actual knowledge of the use of interstate facilities may be proven by a showing that "the particular defendant directly agreed to scheme in which it was known that the likelihood of use of interstate telephone calls was great" Id. at 1326-1327.



in concluding that appellant knew, or reasonably could have been expected to know, that interstate contacts were a part of the operation.<sup>7/</sup>

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<sup>7/</sup> For purposes of this argument, we have assumed that the government was required to show appellant's knowledge of interstate contacts; our view, however, is that it was not required to do so much.

While it may be that in order to convict for violations of the White Slave statutes, interstate knowledge must be shown (see Harms v. United States, 272 F.2d 478, 481 (4th Cir. 1959), cert. den., 361 U.S. 961 (1960)), a conviction for conspiracy to violate the Travel Act (18 U.S.C. 1952) requires only proof that the defendant intended to commit the underlying state offense, and not any separate intent to use an interstate facility or knowledge that such a facility was used. We base this position on the Supreme Court's recent holding in United States v. Feola, 420 U.S. 671 (1975) that the government is not required to show any greater knowledge or intent to prove a conspiracy to commit a crime than to prove the crime itself, and upon the holdings of numerous Courts of Appeals that a conviction under §1952 does not require separate knowledge of, or intent to use, interstate facilities. United States v. LeFaivre, 507 F.2d 1288, 1297 (4th Cir. 1974), cert. den. 420 U.S. 1004 (1975); United States v. Doolittle, 507 F.2d 1368, 1372 (5th Cir. 1975), affirmed en banc, 518 F.2d 500; United States v. Miller, 379 F.2d 483, 486 (7th Cir. 1967), cert. den. 389 U.S. 930; United States v. Hanon, 428 F.2d 101, 108 (8th Cir. en banc 1970), cert. den. 402 U.S. 952 (1971); United States v. Roselli, 432 F.2d 897, 890-891 (9th Cir. 1970), cert. den. 401 U.S. 924 (1971). But see, contra, the opinions of the Sixth Circuit in United States v. Barnes, 383 F.2d 287, cert. den. 389 U.S. 1040 and United States v. Prince, 529 F.2d 1108 (1976). Since appellant was convicted of conspiracy to violate, inter alia, §1952, his conviction should be affirmed irrespective of whether interstate knowledge was shown. At all events, in light of the quantity of the proof of interstate knowledge, we do not believe it is necessary in this case for the court to decide the issue.



## II.

### THE SEARCH WARRANTS ISSUED FOR TWO APARTMENTS USED IN THE PROSTITUTION BUSINESS WERE SUPPORTED BY PROBABLE CAUSE.

Appellant contends that two search warrants issued in the investigation of this case were invalid because the supporting affidavits failed to establish probable cause to believe that a federal crime had been committed. This claim was thoroughly considered and properly rejected by the district court in an opinion (App. Apx. 20-31)<sup>8/</sup> upon which we essentially rely.

1. The warrants were issued on January 21, 1974, by United States Magistrate Edmund F. Maxwell, and executed the same day by federal agents who searched apartment 401 at 200 Niagara Street, Buffalo, New York, and Linda Ferguson's apartment at 829 Elmwood Avenue, also in Buffalo. The agents seized notes and records of the prostitution operation which were subsequently introduced at trial.

The warrants were based on identical affidavits executed by Special Agent Ronald Lee Hawley of the Federal Bureau of Investigation who relied upon information obtained from three informants. As set forth in the affidavit (App. Apx., 14-19), the first informant was personally known by Hawley to be a reliable source whose previous statements in connection with other prostitution cases had been consistently corroborated by F.B.I. investigations. The informant said he had been a customer of the prostitution operation for two years. Under Hawley's super-

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<sup>8/</sup> "App. Apx." denotes appellant's appendix.



vision, the informant telephoned Ferguson at 829 Elmwood Avenue on two separate occasions and each time was instructed by her to go to apartment 401 at 200 Niagara Street where the prostitution occurred. One of the prostitutes, later identified as Darlene Baggetta, told the informant that she was from Albany, New York and had previously worked as a prostitute in Boston, Massachusetts.

The second informant was Baggetta herself, identified in the affidavit as "Joyce Williams," the name she had given at the time of her arrest. Her information was reported to Agent Hawley by Detective Sergeant Dayke of the Buffalo Police Department. Baggetta gave Dayke a home address in Boston and told him that Ferguson had telephoned here there to hire her as a prostitute in Buffalo. Baggetta said she accepted the offer and took a bus to Buffalo where she met appellant and Ferguson. She identified both from police photographs and said that appellant had been present during a conversation in which Ferguson instructed her about the details of the prostitution operation (App. Apx. 15-17).

Finally, a third informant (unnamed in the affidavit but presumably Rita Burchill) said that she had been brought to Buffalo from another state in late 1972 to work as a prostitute for Linda Ferguson. The third informant also identified photographs of Ferguson and appellant, whom she said was Ferguson's pimp.

2. This information established ample probable cause to



believe that the illicit business under investigation involved interstate transportation of prostitutes and was therefore a federal offense. Indeed, appellant concedes that the information provided by Darlene Baggetta ("Joyce Williams"), if reliable, "would have provided the essential interstate element" (Br. 24). In fact, however, all the informants had first-hand knowledge of the operation and two of them, Baggetta and Burchill, said that they had traveled across state lines to become part of it.<sup>9/</sup>

There is no merit in appellant's argument (Br. 24-27) that the reliability of this information was not shown. Baggetta's statement to police was a declaration against interest (see United States v. Harris, 403 U.S. 573, 585 (1971); the information she provided dovetailed with the first informant's statement; and Baggetta herself corroborated the statement by identifying the photographs and by telephoning Ferguson from the police station. See United States v. Miley, 523 F.2d 1191, 1204 (2nd Cir. 1975).<sup>10/</sup> These indicia of reliability were, as the district

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9/ The magistrate was also entitled to consider that a prostitution operation in Buffalo, New York, located near the state border, would involve interstate transportation or the use of interstate facilities. See United States v. Burke, 467 F.2d 247, 249 (2nd Cir. 1972) holding that geographic location is an element to be taken into account in proving that defendants have knowledge of the use of interstate communications, although location alone is insufficient to prove such knowledge beyond a reasonable doubt. Of course, a finding of probable cause does not require proof beyond a reasonable doubt, but only a probability that a federal crime has been committed. Beck v. Ohio, 397 U.S. 89 (1964).

10/ The fact that Baggetta later said she had gone from Boston to Albany, where Ferguson called her, and then to Buffalo does not retroactively undermine the magistrate's finding of probable cause. United States v. Sultan, 463 F.2d 1066, 1070 (2nd Cir. 1972).



court noted, "sufficient to establish a basis for crediting the report of Source II [Baggetta]" (App. Apx. 26).<sup>11/</sup> The statement provided by Source III (presumably Burchill) was, likewise, a declaration against interest and (as shown in the affidavit (App. Apx. 18)), related the same facts to which the source had previously sworn before a grand jury. See James v. United States, 416 F.2d 467, 473 (5th Cir. 1969), certiorari denied 397 U.S. 907 (1970). She knew Ferguson's address, identified photographs of appellant and Ferguson, and based her statements on first-hand conversations and observations. Although her information was one year old, it was corroborated by the more recent statements of the other informants and by independent investigation.

In short, the affidavits set forth the underlying circumstances in which the informants gathered their information plus corroborating facts showing that the informants were reliable. See Spinelli v. United States, 393 U.S. 410 (1969); Aguilar v. Texas, 378 U.S. 108 (1964). The magistrate and the district court were therefore correct in agreeing that the affidavits made out probable cause to believe a federal crime was being committed,

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<sup>11/</sup>The information was not any less reliable because it was given to Hawley by a local police officer rather than Baggetta; law enforcement officers are presumed to be reliable sources of information, and appellant has suggested nothing to undermine that presumption here. See United States v. Fiorella, 468 F.2d 688, 691 (2nd Cir. 1972); United States v. Dzialak, 441 F.2d 212, 216 (2nd Cir. 1971).



and the warrants issued on the basis of those affidavits were, accordingly, valid.

### III.

#### APPELLANT'S SENTENCE WAS NOT EXCESSIVE.

Appellant lastly contends that his sentence of two and one-half years' imprisonment was excessive. The statutory maximum, however, is five years' imprisonment and a \$10,000 fine (18 U.S.C. 371). The Supreme Court "has recently reaffirmed the 'general proposition that once it is determined that a sentence is within the limitations set forth in the statute under which it is imposed, appellate review is at an end.' Dorszynski v. United States, 418 U.S. 424 ... (1974)." United States v. Seijo, 537 F.2d 694, 700 (2nd Cir. 1976). Since appellant makes no showing either that the sentencing court relied upon constitutionally impermissible factors or upon material inaccuracies<sup>12/</sup> (see United States v. Glazer, 532 F.2d 224, 231 (2nd Cir. 1976), there is

<sup>12/</sup>Appellant's primary complaint is that the district judge sentenced him on an unfounded assumption that his prostitution business was involved with organized crime.

While it drew no conclusions, the court pointed out that appellant's business flourished openly for six years without any apparent response from the local police, and that despite the large amounts of money received by appellant and Ferguson, both claimed to have none. The court remarked that "judges ought not to close their eyes to things that all other people can see and understand," and suggested the possibility that "an organization exists with respect to this business" (Sen. Tr. 25-26).

Appellant to the contrary, this was not a statement that he was a figure in organized crime, nor did it imply anything beyond what the evidence had already shown. Two of the prostitutes had been brought to Buffalo from similar and apparently cooperative businesses in other states; one had been "trained" in Ohio. The Buffalo operation was, indeed, an organization unto itself, complete with sets of books and with records noting the skill and reliability of the employees. See note 5, supra.



no occasion to disturb the sentence imposed by that court.

CONCLUSION

For the foregoing reasons it is respectfully submitted that appellant's conviction should be affirmed.

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12/(CONT'D)

Finally, whatever may have been the import of the court's reference to "an organization", the sentence here was fully justified by the offense. Appellant was a central figure, if not the central figure, in a conspiracy lasting "a good six years" (Tr. 149) and involving the prostitution of teenage children.



CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing for  
the United States have this day been mailed to counsel for  
Appellant listed below:

Philip B. Abramowitz  
815 Liberty Bank Building  
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DATED:

April 18

, 1977

Henry Walker

HENRY WALKER

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A P P E N D I X

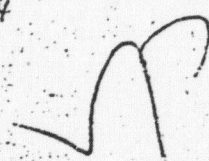


Linda Ferguson

1/21/74

WJL

Shawn



Jim Beamer  
per. written  
8-7-74

BOB

St. Regis

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Honey,

I went down town  
for I just thought I'd  
get an early start.

Maybe latter we can  
take a ride some  
where.

Love Ya Baby. heres a  
few kiss to remind  
you. XXXXX

Your Lover Always  
Linda

Come down and get me!



73

\* Jessy in Dona - 88-1-5108 good worker  
88-6-9474 not to getting - late twenty  
5"8" Light hair.

no good  
Ellion 617-734-6071 - CHEAT  
no repeats - getting girl -  
5"8" BLACK HAIR - 19 years old

Shelby - 412-441-8546 - OK! N. Repert  
Deorgette 412-751-2386 5"7 BLOND  
JAN. 6-13-

Falls  
Jan + Jimmy

OK Nate - 412-362-2781 good connection  
-441-0525

~~James~~ - 717-825-6770 no good

~~all in N.D.~~  
Terry - 518-465-6446

Brandy - 412-363-1852

Debby 518-462-6156  
5"9 - L. Brown hair - 140.



★ Vickey - Mary Repeat Best worker  
had 2 1/2 years old. Great person.  
★ average height Brown hair - good  
looking. No complaints.  
314-328-4918 Anne



Very Good worker - Harold's Woman  
from Albany. with tips 850  
Tues Sat Nov 1

Sat	Buffalo Bob	30	15 00
	Andy	50	25 00
		<u>85</u>	<u>40</u>
			- 3. Rent
			<u>(10)</u>

Sun.	Tom Sweeney	40	20	
	Joe	20	10	
	old Joe	25	12 50	
	Wally	<u>30</u>	<u>15 00</u>	
		115	57 50	<u>(57.50)</u>

Mon	Hal	25		
	old Joe	20		
	Mel	30		
	Don C	40		
	Walter	25		
	Sam K	<u>20</u>		
		160		<u>(80.00)</u>

Tues.	Big Frank	30		
	FREND	30		
	Buffalo B.B.	30		
	Johnny	25		
	Lee Johnson	30		
	Tony B.	30		
	Alax	<u>25</u>		
		260	100-10	<u>(90.00)</u>

Wens.	Jim	60		
	John	25		
		<u>40</u>		
		125		
			test	<u>(42.50)</u>

A-7

in. x 5 3/4 in.

0007 U.S.A.



Thur	C.J.	20	10
	Bob	<del>25</del>	<del>15.50</del>
	Joe	20	15.50
		<u>65</u>	<u>25.50</u>

(35.50)

Friday	Jack	20	20.00
	Pete	25	12.50
	Steve	25	12.50
		<u>70</u>	<u>35.00</u>

(35.50)

Sat.	10	Crazy Dick	- 30.00	- 15
		Hum Frank	- 30.00	- 15
		Hall	- 35.00	- 17.50
		Quincy	- 40.00	- 20.00
			<u>135.00</u>	<u>- 67.50</u>

67.50







Big Frank

STAN BOROWICZ  
5'6" SHORT

Jan 27, 1917

Red - 30 MAR 27  
717 8239244 Monday  
717-333-4913 Tues  
Garry Lee Wens  
6'10" - April 9, 29 Thur  
185 lbs Frid  
Red Sport Jacket

4	0	8
	2	5
1	0	0
	8	0
	1	5
	6	2
	8	
-	1	0
	4	2
	8	

Friday

Joe - all over  
6" Italian  
about 50 / chin  
fat - belly - ruff

Friday

Chas 798 2400  
798 1327 medicine  
Garry Botchell  
6'4" - thin  
blackest hair  
about 50

~~W. Rep 852 9728 - 30~~  
~~about 55~~  
~~tall 6'1" grey hair~~  
~~Black Rim glasses~~

Nice - nice figure



(408) Last week - 5"3 - black hair pretty  
 Terry speaks with accent. Good worker.

22

4 0 8  
 2 5  
 1 0 0  
 8 0  
 1 5  
 6 2 8  
 1 9 0  
 4 3 8

628

Friday

28 30

28

28

a figure

Day	Sam 74			408
Mon.	Stanley - 30	- 15.00	<del>15.00</del>	
	Norm Do - 20	- 10.00		
	(50)	25.00		4 0 8
	Norm Do - 50	- 25.00		25
	John Toblin - 35	- 17.50		1 00
	Little Joe - 25	- 12.50		80
	Wally - 30	- 15.00		15
	Danny - 40	- 20.00		33
	Al West - 20	- 10.00		68 1
	(200)	100.00		
Wende	Bill	30 - 15.00		
	Tony	25 - 12.50		
	CHUCK	30 - 15.00		
	Friend	25 - 12.50		
	Friend	25 - 12.50		
	Andy	25 - 12.50		
	160	80.00		
Thurs.	Jerry	30 - 15.00		
Frid.	White	20 - 10.00		
	Big FRANK	30 - 15.00		
	Friend	30 - 15.00		
	Old Joe	25 - 12.50		
	105	52.50		



me - Nov - 17, 1973

Sat - Hal	25	-	25	25	
Sunday	40-10 <sup>Bills</sup>	-	30	40	- 10.00 <sup>Bills</sup>



HARold's woman - 5'5" LIGHT HAIR - ONE of  
the BEST. EVERYONE LOVED  
HER.

Debby -

- 11 duck bag  
pouches

3

25  
40 - 10.00 <sup>Bills</sup>

Mon.

Joe - 20  
Al West - 20

10.00 <sup>ducks</sup>  
10.00

Tues.

Tom Dweeney - 40.00  
Steve - 25.00  
Mell - 30.00  
Charlie 10.00  
HAL - 25.00

20.00  
12.50  
15.00  
5.00  
12.50

130.00

65.00 <sup>SPENT</sup>

Wed.

~~Jack~~

Crazy Dick - 50 -

25.00

Don C. - 50 -

25.00

7:00

Bob L. - 20 -

10.00

Big Frank - 30 -

15.00

Stanly 30 -

15.00

10:00  
10:30

Jim L. 30 -

15.00

11:00

Sam K. 20 -

10.00

11:30

old Joe 25 -

12.50

12:00

DANNY 60 -

30.00

315

157.50

Thursday

Keith - 30

15.00

Frid.

Jack - 29

14.50

Beaton - 20

10.00

Frank - 40

20.00

Tom D - 50

25.00

Pete - 25

12.50

old Joe - 25

12.50

Dave L - 120

60.00

339

179.50



Sat. Hal - 25 - 12.50 12 50

John - 25 - 12.50  
+ 5.00  
30.00

Little Al 25 - 12.50  
Danny 70 - 35.00  
143 77.50

~~67~~ 50

157.50

179.50

~~247.50~~

23 50

157.50

179.50

~~53~~ 50

\$390.50

385.00  
- 140.00  
245.00

15.00  
mistake

157.50

179.50

337.00

30.00

367.00

- 50.00

317.00

157.50

179.50

337.00

77.50

414.50



Petty - But you have to keep at  
her or she lets her self go.

Linda No Repeat - Funny girl - FLAKE  
makes woman Pittsburgh

12 50

67 50  
157 50  
179 50  
~~249 50~~  
23 50

157 50  
179 50  
~~33 50~~  
\$390.50

Sunday - Tom Swenny - 30 15  
Joe - 20 10  
Wally - 30 15  
Joe Danoff - 30 15  
B M - 55  
- 30  
25

Monday Pete - 20 - 10  
Johnny - 20 - 10  
Cray Pitter - 30 - 15  
Pete - 40 - 20  
170 - 55

Tues. Sarge 20 - 10.00  
Stan 30 - 15.00  
Sam R 20 - 10.00  
Lee Johnson 30 - 15.00  
180 50.00

Wed. Big Forke 30 - 15.00  
Norm M 50 - 25.00  
Mell 30 - 15.00  
Walt 35 - 17.50  
145 72.50







December  
Sun. 2

was working - Mike  
don't touch me here  
there

Tom 30 - 15.00  
Blind 30 - 15.00  
Tod 25 - 12.50  
Steve 25 - 12.50  
Joe 20 - 10.00  
130 65.00

- 25.00 Rent  
40.00  
- 15.00 stock  
25.00

Finished  
25 00  
90 00  
52 50

Double  
Cheeks  
money

Nasty  
with  
sticks

Mon. Norm - 50.00 - 25.00  
Dick K - 40.00 - 20.00  
Joe T. - 40.00 - 20.00  
John - 25.00 - 12.50  
May Small - 25.00 - 12.50  
180.00 90.00

Tues Jack L. 20.00 - 10.00  
Peter L. 30.00 - 15.00  
Stan 30.00 - 15.00  
L. Al 25.00 - 12.50  
105.00 52.50

1814555/1212/535 main st.

Wens. Jerry - 40 - 20  
Geo - 20 - 10  
Jim - 30 - 15  
Andy - 20 - 10  
110 - 55

25 00  
90 00  
52 50  
55 00  
57 50  
87 50

Thurs. 3.00 Jack L. - 50 - 25.00  
Hal - 25 - 12.50  
Stan - 30 - 15.00  
Keith - 30 - 15.00  
135 - 67.50

490.

Friday. Dave 120 - 60  
old Joe 25 - 12.50  
P. Bob 30 - 15.00  
175 87.50

373.00  
35.00  
408.00

Sat Bud - 20 - 10.00  
Art - 30 - 15.00  
20 10.00  
78 35.00

70.00  
5.75  
418.75  
70.00  
358.75



# Goey's

537 MAIN STREET  
BUFFALO, N.Y. 14203  
852-5629

Mens Shop

NAME

*Sam Rivola*

A 10701

ADDRESS

CASH	C.O.D.	CHARGE	ON ACCT.	WILL CALL	WILL CALL PAYMENT
QUAN.	DESCRIPTION		PRICE	AMOUNT	
1		Kurt			30.00
1		"			11.00
					41.00
DEPOSIT		13.00		TAX	787
BAL.		30.87		TOT	41.30

Exchanges and returned goods MUST be accompanied by this bill.  
ABSOLUTELY NO CASH REFUNDS  
MOORE BUSINESS FORMS, INC. LEWISBURG, PA.  
A-17



Din —

I owe you 10.5 Linda Huter  
to Sam Rinaldi

Tom Sory  
Russell 2

Boy 34 size 29  
July 14

Red  
Chuck

3  
80 Benificat  
48  
8 jules  
188 telephone  
98 a.m.a.  
70 car

470

98 am.m.45

60

98 a.m.a.

14

4

48

9

40

37

70

411